

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

JANE DOE 1 *et al.*,

Plaintiffs,

v.

GOVERNMENT OF THE UNITED STATES
VIRGIN ISLANDS, *et al.*,

Defendants.

Case Number: 23-cv-10301-AS

**CECILE DE JONGH’S NOTICE OF JOINDER WITH/INCORPORATION OF
CO-DEFENDANTS’ REPLIES IN SUPPORT OF MOTIONS TO DISMISS**

Cecile de Jongh, by and through undersigned counsel, hereby joins in and incorporates in her Reply in support of her own Motion to Dismiss and to Strike (ECF No. 122) (“CDJ Motion”) (collectively, “CDJ Motion and/or Reply”), all arguments raised in her co-defendants’ replies to their respective motions to dismiss and any materials in support thereof, to the extent those arguments are applicable to Ms. de Jongh, are not already raised in the CDJ Motion and/or Reply, and/or to the extent they either further brief and expand upon grounds already raised in the CDJ Motion and/or Reply or raise new grounds for dismissal or transfer that apply to Ms. de Jongh. In support of this notice, Ms. de Jongh notes that a limit of ten (1) pages has been afforded to herself and each other defendant in reply to Plaintiffs’ Opposition of more than eighty pages (ECF No. 148-1). Ms. de Jongh further notes that any absence of a specific response to a point in the Opposition is due to page limitations, and does not concede any of the points or arguments made in the Opposition. Ms. de Jongh respectfully reserves the right to further join and incorporate future arguments by co-defendants.

DATED: August 26, 2024

Respectfully submitted,

/s/
Amelia J. Schmidt (NYS Bar 4947131)
(admitted *pro hac vice*)
Matt Kaiser (admitted *pro hac vice*)
Courtney Forrest (admitted *pro hac vice*)
Kaiser PLLC
1099 14th Street NW, 8th Floor West
Washington, DC 20005
(202) 640-2850
aschmidt@kaiserlaw.com
mkaiser@kaiserlaw.com
cforrest@kaiserlaw.com

Counsel for Cecile de Jongh